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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
v.
KENNETH GOULD

Plaintiff,
Defendant.

Case No.: 1:21-cr-00243 JLT-SKO
STIPULATION TO PERMIT TRAVEL
TO WEST LINN, OREGON;
ORDER

Judge: Hon. Barbara A. McAuliffe

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, Assistant United States Attorney Joseph Barton, counsel for plaintiff, and Marc Days, counsel for defendant Kenneth Gould, that the Court may enter an order permitting Mr. Gould to travel to West Linn, Oregon, between December 22, 2023, and December 27, 2023.

Mr. Gould's conditions of release restrict his travel to the Central District of California, where he resides, and the Eastern District of California. See ECF #12. Mr. Gould would like to visit his oldest daughter and grandchildren, who live in West Linn, Oregon, during the Christmas holiday. If approved, Mr. Gould would leave his residence on December 22, 2023, and return on December 27, 2023. Mr. Gould is not supervised by Pretrial Services; according, defense counsel did not obtain Pretrial Services' position on this request.

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1 Respectfully submitted,

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3 Dated: December 8, 2023

/s/ Marc Days

4 MARC DAYS

5 Attorney for Dennis Falaschi

6 Dated: December 8, 2023

/s/ Joseph Barton

7 JOSEPH BARTON

8 Assistant United States Attorney

9 **ORDER**

10 Upon the parties' stipulation and for good cause shown, the Court hereby authorizes Mr.
11 Gould to travel to West Linn, Oregon, between December 22, 2023, and December 27, 2023.

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13 IT IS SO ORDERED.

14 Dated: December 8, 2023

/s/ Barbara A. McAuliffe

15 UNITED STATES MAGISTRATE JUDGE